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1 2 3 4 5 6 7 8 9 110 111 112 113	SEYFARTH SHAW LLP Michael J. Burns (SBN 172614) E-mail: mburns@seyfarth.com Michael T. McKeeman (SBN 173662) E-mail: mmckeeman@seyfarth.com Joseph J. Orzano (SBN 262040) E-mail: jorzano@seyfarth.com 560 Mission Street, Suite 3100 San Francisco, California 94105 Telephone: (415) 397-2823 Facsimile: (415) 397-8849 Attorneys for Big O Tires, LLC LAGARIAS & BOULTER LLP Peter C. Lagarias (SBN 77091) E-mail: pcl@lb-attorneys.com Robert S. Boulter (SBN 153549) E-mail: rsb@lb-attorneys.com 1629 Fifth Avenue San Rafael, California 94901-1828 Telephone: (415) 460-0100 Facsimile: (415) 460-1099 Attorneys for Sonoma Tires, Inc. and John G. Rhiel, IV		
14	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION		
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17 18 19 19 19 19 19 19 19	SONOMA TIRES, INC., a California Corporation, Plaintiff, v. BIG O TIRES, LLC, a Colorado Limited Liability Company, Defendant. Case No. C 11-0818 RS STIPULATION REGARDING LITIGATION DEADLINES AND [PROPOSED] ORDER		
	Stipulation Regarding Litigation Deadlines and [Proposed] Order; Case No. C11-0818RS		

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1	Big O Tires, LLC ("Big O"), on the one hand, and Sonoma Ti		
2	John G. Rhiel, IV ("Rhiel"), on the other hand, (collectively, "Parties		
3	respective undersigned counsel, hereby stipulate and jointly request the		
4	as follows:		
5	WHEREAS, at the previous case management conference, Plain		
6	that Rhiel was working on a personal bankruptcy filing, and possibly a		
7	Dkt. # 93.)		
8	WHEREAS, thereafter the Court issued a case management sch		
9	Big O to conduct expert discovery beginning sixty days from the date of		
10	two weeks. (See Dkt. # 95.) That expert discovery period opened on		
11	closes on November 11, 2013. The Court also set a further case manage		
12	conclusion of the expert discovery period on December 12, 2013. (See		
13	WHEREAS, Big O has served Plaintiff's expert with documen		
14	on October 29, 2013 and noticed the deposition of Plaintiff's expert for		
15	however, the parties have met and conferred and Plaintiff's counsel has		
16	and possibly Sonoma, still intend to seek bankruptcy protection, that R		
17	through issues related to the filing with separate bankruptcy counsel an		
18	expert is not available on November 11, 2013 for his deposition.		
19	WHEREAS, based on the foregoing, the parties jointly desire to		
20	Big O to complete expert discovery to January 31, 2014 to allow time		
21	Sonoma to complete and file a bankruptcy petition before incurring cos		

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es, Inc. ("Sonoma") and) by and through their at the Court issue an Order

ntiff's counsel represented filing for Sonoma. (See

neduling order permitting of the order for a period of October 28, 2013 and gement conference at the id.)

and deposition subpoenas r November 11, 2013; s represented that Rhiel, hiel continues to work d, further, that Plaintiff's

o continue the deadline for for Rhiel and possibly Sonoma to complete and file a bankruptcy petition before incurring costs of expert discovery.

WHEREAS, the parties further jointly desire to continue the case management conference until February 13, 2014, or on such date thereafter that is convenient for the Court.

IT IS THEREFORE STIPULATED AND JOINTLY REQUESTED that:

- 1. The Court order that the November 11, 2013 deadline for Big O to complete expert discovery be continued to January 31, 2014.
- 2. The December 12, 2013 case management conference be continued to February 13, 2014 or on such date thereafter that is convenient for the Court.

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1	IT IS SO STIPULATED.		
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3	Dated: November 6, 2013	SEYFARTH SHAW LLP	
4		By/s/ Joseph J. Orzano	
5		Joseph J. Orzano Attorneys for Big O Tires, LLC	
6			
7	Dated: November 6, 2013	LAGARIAS & BOULTER, LLP	
8		By/s/ Peter C. Lagarias	
9		Peter C. Lagarias Attorneys for Sonoma Tires, Inc. and	
10		John G. Rhiel, IV	
11			
12	[PROPOSE D] ORDER		
13	PURSUANT TO STIPULATION, IT IS SO ORDERED,		
14	1. The deadline for Big O to con	mplete expert discovery is extended to January 31,	
15 16	2014.		
17	2. The December 12, 2013 case	management conference is continued to February	
18	13, 2014 at 10:00 a.m. The p	parties shall file a Joint Case Management	
19	Conference Statement at leas	t one week prior to the Conference.	
20	3. All other deadlines remain ur	nchanged.	
21	Dated:11/7/13	The Honorable Richard Seebag	
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